

## **Exhibit 6**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF OHIO  
3 EASTERN DIVISION  
4 - - -

5 IN RE: NATIONAL : MDL NO. 2804  
6 PRESCRIPTION OPIATE :  
7 LITIGATION :  
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8 : CASE NO.  
9 THIS DOCUMENT : 1:17-MD-2804  
10 RELATES TO ALL CASES:

11 : Hon. Dan A.  
12 : Polster  
13 - - -

14 Friday, August 3, 2018  
15 - - -

16 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
17 CONFIDENTIALITY REVIEW  
18 - - -

19 Videotaped deposition of  
20 CHRISTOPHER ZIMMERMAN, taken pursuant to  
21 notice, was held at the law offices of  
22 Reed Smith, LLP, Three Logan Square, 1717  
23 Arch Street, Suite 3100, Philadelphia,  
24 Pennsylvania 19103, beginning at 9:00  
a.m., on the above date, before Amanda  
Dee Maslynsky-Miller, a Certified  
Realtime Reporter.

19 - - -  
20  
21  
22

23 GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com  
24

1                   Q.        Okay.  Before 1998, what was  
2       the method of calculating a threshold at  
3       AmerisourceBergen?

4                   MR. NICHOLAS:  Same  
5       objection.  Outside the scope of  
6       the 30(b) (6).

7                   THE WITNESS:  The method of  
8       calculating the threshold prior to  
9       that was that you would -- all  
10      pharmacies would be in one  
11      category, hospitals would be in  
12      another category.  You take all  
13      the pharmacies within that  
14      category and divide by the number  
15      of pharmacies to come up with an  
16      average volume for the month per  
17      drug category.  And then there was  
18      a multiplier of three.  Any order  
19      that was over the threshold amount  
20      would be produced an excessive  
21      order report.

22     BY MR. PIFKO:

23                   Q.        But it would still be  
24      shipped?

1 A. The product?

2 Q. Yes.

3 A. Yes.

4 Q. After 1998, what was the  
5 practice with respect to calculating  
6 thresholds?

7 MR. NICHOLAS: Same

8 objection. Outside the scope.

9 THE WITNESS: So in 1996, we  
10 worked with DEA, for two years,  
11 on -- in order to provide DEA with  
12 more -- we feel, more accurate  
13 information, that we worked on a  
14 project to where we would identify  
15 a customer based upon its own  
16 purchase history versus all  
17 pharmacies in one big bucket.

18 And then we calculated a  
19 rolling four-month average of that  
20 pharmacy's purchases. And then  
21 created a multiplier of three to  
22 identify a trigger that would  
23 identify a suspicious order.

24 BY MR. PIFKO: